

REMARKS

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Office Action dated March 2, 2005. In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

Status of the Claims

Claims 1-19 are pending in the application, wherein claims 1-19 have been rejected by the Examiner and claim 12 has been amended herein. Reconsideration of the present Application is respectfully requested.

Amendment After Final

Entry of this Amendment is respectfully requested on the ground that this Amendment places the application in condition for allowance. Alternatively, entry of this Amendment is respectfully requested on the ground that this Amendment places the claims in better form and condition for appeal. Furthermore, Applicant submits that any changes made to the claims herein do not require an additional search on the part of the Office, nor do any amendments made herein raise new issues with regard to the patentability of the claims now pending.

Rejections under 35 U.S.C. 102(e)

Claims 12 and 14 – 16 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Franz (United States Patent No. 6,356,865). Applicant respectfully traverses these rejections for at least the following reasons.

Anticipation under 35 U.S.C. § 102 requires the cited art teach every aspect of the claimed invention. See, M.P.E.P. §706.02(a). In other words, "a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See, M.P.E.P. §2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Amended Claim 12 recites, in part,

a memory having stored thereon a plurality of model sentences, wherein the prescribed symbol string is present among the plurality of model sentences and **wherein only the plurality of model sentences wherein the prescribed symbol string is present are displayed on said unit;**

The present Office Action sets forth that Franz displays sentences. (Franz at Figures 13-17). Applicant respectfully submits that the referenced Figures of Franz and the associated description display an utterance hypothesis which is the result of speech recognition. See Col 16, lines 22-24. The utterance hypothesis is displayed by Franz to allow the proper hypothesis to be selected. See Franz Col 16, lines 32-35. As such, Franz is directed solely to recognizing speech. Rather, the present invention is directed to recognizing only a key portion of the speech (the "prescribed string") and determining if any of the limited number of model sentences is associated with the recognized speech portion. If any of the sentences do match part of the key speech portion, the present invention displays the plurality of matching model sentences.

As such, the present invention uses a symbol string to define possible matching model sentences from a limited set of model sentences that are previously identified as being possibly useful. The model sentence may not actually match the recognized speech portion, but instead may just conceptually match part of the recognized speech portion. Thus, the prior art displays an utterance hypothesis that best matches a spoken sentence, and, in direct contrast to the prior art, the present invention searches spoken information not to perform speech recognition, but rather to find key strings that are then used to approximate matching model sentences from a limited group of model sentences..

Accordingly, Applicant submits at least Claim 12 is patently distinguishable over the prior art cited. Applicant further submits that Claims 13-17 are similarly distinguishable over the prior art cited by virtue of its ultimate dependency from patently distinct base claim 12.

Rejections under 35 U.S.C. 103(a)

Claims 1 – 10 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg (United States Patent No. 6,161,082) in view of Franz (United States Patent No. 6,356,865) and further in view of Fushimoto (United States Patent No.

5,742,505). Claim 11 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg (United States Patent No. 6,161,082) in view of Franz (United States Patent No. 6,356,865) and further in view of Emery (United States Patent No. 5,727,057). Claim 13 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Franz (United States Patent No. 6,356,865) in view of White (United States Patent No. 6,408,272). Claim 17 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Franz (United States Patent No. 6,356,865) in view of Emery (United States Patent No. 5,727,057). Claim 18 – 19 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg (United States Patent No. 6,161,082) in view of Franz (United States Patent No. 6,356,865). Applicant respectfully traverses these rejections for at least the following reasons.

35 U.S.C. §103(a) recites:

[a] patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negated by the manner in which the invention was made.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). *MPEP 706.02(j)*.

Claim 1 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg (United States Patent No. 6,161,082) in view of Franz (United States Patent No. 6,356,865) and further in view of Fushimoto (United States Patent No. 5,742,505). Applicant respectfully traverses this rejection for at least the following reasons.

Claim 1 recites, in part,

displaying the plurality of registered sentences on a mobile terminal display communicatively connected to the interpretation server;

receiving speech, in a first language, inputted to the mobile terminal **displaying at least one of the plurality of registered sentences**, at the interpretation server;

As specifically referenced in the present Office Action, Goldberg et al. fail to disclose the step of displaying the plurality of registered sentences on a mobile terminal display communicatively connected to the server, and displaying in accordance with languages available at the interpretation server [sic] of an interpretable language classification menu on the terminal.

The present Office Action attempts to fill the deficiency in the teaching of Goldberg with respect to the present rejection by citing to Franz. As discussed hereinabove, Franz is directed to recognizing inputted speech and translating the recognized speech. The present invention is directed to recognizing only a portion of the speech, such as the prescribed string or keyword, and associating the recognized speech portion with at least one of the model sentences identified from among the model sentences previously selected. The present invention then displays only the associated model sentences. Since Franz does not have model sentences and instead merely translates the inputted speech, Franz does not teach displaying only selected model sentences, as occurs in the present invention.

This deficiency in the rejection using Franz is not remedied by the additional reference Fushimoto, nor does the present Office Action assert that Fushimoto teaches displaying selected model sentences as claimed in claim 1. Applicant respectfully submits that Claim 1 is thus not obvious based on Goldberg in view of Franz and further in view of Fushimoto.

Accordingly, Applicant submits at least Claim 1 is patently distinguishable over the prior art cited. Applicant further submits that Claims 2-11 are similarly distinguishable over the prior art cited by virtue of its ultimate dependency from patently distinct base claim 1.

Claim 18 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg (United States Patent No. 6,161,082) in view of Franz (United States Patent

No. 6,356,865). Applicant respectfully traverses this rejection for at least the following reasons.

Claim 18 recites, in part,

wherein the terminal comprises a **display that displays at least one selected only from the plurality of model sentences** when the speech is inputted.

As specifically referenced in the present Office Action,

Goldberg et al. fail to disclose that the terminal comprises a display that displays at least one selected only from the plurality of model sentence when the speech is inputted.

The present Office Action attempts to fill the deficiency in the teaching of Goldberg with respect to the present rejection by citing to Franz. As discussed hereinabove, Franz is directed merely to recognizing inputted speech. The present invention is directed to recognizing a portion of the speech, such as a prescribed string, and associating the recognized speech portion with at least one of a limited number of model sentences, and further to displaying the associated model sentences. Claim 18 recites "a display that displays at least one selected only from the plurality of model sentences." For the reasons set forth above, Franz does not teach displaying model sentences as claimed in Claim 18. Applicant respectfully submits that Claim 18 is thus not obvious based on Goldberg in view of Franz.

Accordingly, Applicant submits at least Claim 18 is patently distinguishable over the prior art cited. Applicant further submits that Claim 19 is similarly distinguishable over the prior art cited by virtue of its ultimate dependency from patently distinct base claim 18.

Conclusion

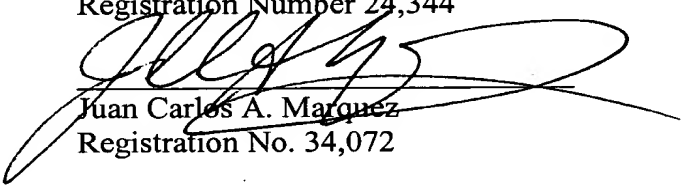
In view of all the above, Applicant respectfully submits that certain clear and distinct differences as discussed exist between the present invention as now claimed and the prior art references upon which the rejections in the Office Action rely. These differences are more than sufficient that the present invention as now claimed would not

have been anticipated nor rendered obvious given the prior art. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application as amended is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicant's undersigned representative at the address and phone number below.

Respectfully submitted,

Stanley P. Fisher
Registration Number 24,344



Juan Carlos A. Marquez
Registration No. 34,072

Thomas J. McWilliams
Registration No. 44,930

REED SMITH LLP
3110 Fairview Park Drive
Suite 1400
Falls Church, Virginia 22042
(703) 641-4200

May 26, 2005